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**VIA ECF**

The Honorable Judge Irizarry  
United States District Court  
Eastern District of New York  
225 Cadman Plaza  
Brooklyn, NY 11201

Re: Windward Bora, LLC v. Stuyvesant Construction Corp. et al  
Docket No. 19-CV-7275 (DLI) (CLP)

Dear Honorable Judge Irizarry:

Our office represents Windward Bora, LLC in the above referenced action. This letter is submitted to request an extension of time to serve its opposition to Defendant's motion and its cross-motion for summary judgment. This letter is submitted 3 business days before the deadline sought to be extended pursuant to your Honor's Rules.

1. The reason for the request: The undersigned is requesting the adjournment due to a personal matter. The undersigned is still not settled and is in the process of obtaining a temporary residents for himself and his family. We hope that this situation should end shortly and our permanent home will be ready for us to move in. It has been extremely difficult to work full time, move out of our current residence and find a temporary residence at the same time. Given the history of this action, the undersigned needs additional time to submit a proper response and cross-motion.
2. The original deadline: The original deadline is July 1, 2022.
3. The number of previous requests for adjournments or extensions: One previous request has been made.
4. Whether these previous requests were granted or denied: The Court granted Plaintiff's previous request.
5. Whether the adversary consents, and, if not, the reason given by the adversary for refusing to consent: Defendant's counsel has not given his consent to the adjournment. He advised that he has reached out to his client to obtain authority to consent, but he has yet to receive a response.



6. Proposed date(s) for the adjournment or extension of time: The undersigned requests a 2 week extension bringing the time to serve the papers to July 15, 2022. The undersigned then respectfully requests that the deadlines for replies be adjourned by 2 weeks as well. Defendant's time to serve opp/reply shall be extended from July 15, 2022 to July 29, 2022 and Plaintiff's time to reply shall be extended from July 29, 2022 to August 12, 2022.

Thank you for your time and attention to this matter.

Respectfully submitted,

/s/Rafi Hasbani  
Rafi Hasbani, Esq.

Via ECF  
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